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Mark T. Power, Esq. (*pro hac vice* forthcoming)
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*Proposed Local Counsel to the Official
Committee of Unsecured Creditors*

*Proposed Lead Counsel to the Official
Committee of Unsecured Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

-----X
In re:

Paper Source, Inc., *et al.*,¹

Debtors.

Chapter 11
Case No. 21-30660 (KLP)

(Jointly Administered)

-----X
**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF NOTICES AND OTHER DOCUMENTS**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Pine Holdings, Inc. (4460) and Paper Source, Inc. (8035). The Debtors' service address is 125 South Clark St., Chicago, IL 60603.

PLEASE TAKE NOTICE that the law firm of Hahn & Hessen LLP and Hirschler Fleischer, P.C. hereby appear as proposed counsel on behalf of The Official Committee of Unsecured Creditors of Paper Source, Inc., et al. (the “Committee”) that has been appointed in the above-referenced chapter 11 bankruptcy cases, and that pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Sections 102(1), 342 and 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), all notices given or required to be given in this case and all documents served or required to be served in this case be given to and served upon the following:

Mark S. Indelicato, Esq.
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PLEASE TAKE FURTHER NOTICE, that, if applicable, pursuant to 11 U.S.C. § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and Bankruptcy Code provision specified above, but also includes, without limitation, all orders, hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plans of reorganization and liquidation, and disclosure statements, notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or

conveyed by mail, courier service, delivery, telephone, telegraph, telex, telecopy, electronic mail or otherwise, made by the Debtors or any third party in the bankruptcy case or any adversary proceedings or contested matters therein.

PLEASE TAKE FURTHER NOTICE, that the undersigned intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (a) the right of the Committee to have final orders in (i) non-core matters, and (ii) matters designated for final adjudication in the Bankruptcy Court as a statutory matter pursuant to 28 U.S.C. § 157(b), but prohibited from proceeding as such pursuant to Article III of the Constitution, entered only after de novo review by a federal district court judge (and nothing contained herein shall be construed or otherwise deemed to be a waiver of such right by the Committee or consent by the Committee to final adjudication in the Bankruptcy Court of such matters); (b) the right of the Committee to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (c) the right of the Committee to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (d) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (e) an election of remedy; or (f) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Committee is or may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

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Dated: March 17, 2021

Respectfully submitted,

/s/ Robert S. Westermann

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Proposed Lead Counsel for The Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2021, I caused a true and correct copy of the foregoing Notice to be electronically served by the Court's CM/ECF system, which thereby caused an electronic notification of filing to be served on all other registered users of the ECF system who have filed notices of appearances in this case.

/s/ Robert S. Westermann

Counsel